



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL
CLEANUP

January 4, 2018

Kris McCaig
Project Manager
Teck American Incorporated
501 North Riverpoint Boulevard, Suite 300
Spokane, Washington 99202

VIA ELECTRONIC MAIL ONLY

Dear Ms. McCaig,

The purpose of this letter is to notify Teck American Incorporated (TAI) that the Environmental Protection Agency (EPA) is defining the upper reaches of the riverine portion of the Upper Columbia River (UCR) Site as a separable operable unit (OU) that is to be characterized in accordance with Task 3 of the Scope of Work in the Settlement Agreement. The Upper Reach OU will encompass the upper reaches of the Columbia River between Marcus at river mile (RM) 708 and the international border just north of RM 744. The Upper Reach OU requires different approaches for site characterization, risk assessment, and development of potential remedial options than the lower reaches of the UCR Site.

Additional characterization is needed to determine the spatial extent of potentially toxic sediments in the OU in order to complete the baseline ecological risk assessment (BERA) as outlined in the approved BERA Work Plan. The BERA Work Plan discusses the importance of "investigating nature and extent of contamination at the Site, to provide information to support the baseline risk assessment" and speaks specifically to spatial refinements to "define and delineate the nature and extent of sediment contamination". Data gaps identified in the LOE for the Upper Reach OU include sediment facies mapping, and 19 unsampled depositional features requiring surface sediment samples and sediment cores. The contents of the attached LOE are based on elements of work agreed to by Teck in the Settlement Agreement, EPA's RI/FS guidance documents, the UCR Remedial Investigation and Feasibility (RI/FS) Work Plan, and the BERA Work Plan.

TAI shall submit a draft quality assurance project plan (QAPP) to fill the site characterization data gaps identified in the LOE within 60 days of receiving this letter. EPA's expectations for the site characterization effort are described in the attached Upper Reach OU Site Characterization Level of Effort (LOE) document.

Collection in 2018 of the data set forth in the LOE will expedite the completion of the RI/FS and a Record of Decision (ROD), consistent with the EPA Administrator's stated priorities for the Superfund Program.

EPA looks forward to working with TAI to complete characterization of the Upper Reach OU. Please contact me at (206)553-2589 if you have questions or concerns.

Sincerely,

A handwritten signature in blue ink, reading "Kathryn S. Cerise", is positioned above the printed name.

Kathryn Cerise
EPA Remedial Project Manager

cc: Dan Audet, U.S. Department of Interior

Cindy Marchand, Confederated Tribes of the Colville Reservation
Tamara Knudson, Spokane Tribe of Indians
John Roland, Washington Department of Ecology